

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ALL FUNDS ON DEPOSIT AT SUN
SECURED ADVANTAGE ACCOUNT
NUMBER 26-2673-031320 HELD AT THE
BANK OF N.T. BUTTERFIELD AND SON
LIMITED IN BERMUDA,**

Defendant.

CIVIL ACTION NO. 2:13-CV-33

**VERIFIED CLAIM OF SENATOR LUIS FERNANDO SALAZAR
FERNÁNDEZ CONTESTING ASSET FORFEITURE**

1. As the Government's Verified Complaint for Civil Forfeiture in Rem makes plain, the Defendant Funds were embezzled and stolen from and belong to the State of Coahuila, Mexico. Pursuant to Rule G of the Supplemental Admiralty and Maritime Claims, Luis Fernando Salazar Fernández, citizen and elected Senator from the State of Coahuila, Mexico, files, on behalf of himself and his constituents, the following claim contesting forfeiture and seeks to return those funds to the State of Coahuila, Mexico.

I. Specific Property Claimed

2. Senator Salazar claims, on behalf of himself and the citizens of the State of Coahuila, Mexico, all funds on deposit at Sun Secured Advantage Account Number 26-2673-031320 held at the Bank of N.T. Butterfield and Son Limited in Bermuda (the "Defendant Funds"). On information and belief, the Defendant Funds amount to \$2,275,544.41. Senator Salazar further claims, on behalf of himself and the citizens of the State of Coahuila, Mexico, all further funds seized in this proceeding that rightfully belong to the State of Coahuila, Mexico.

II. Senator Salazar is a citizen of the State of Coahuila, Mexico and a Senator representing the citizens of the State of Coahuila, Mexico

3. Senator Luis Fernando Salazar Fernández is a citizen of the State of Coahuila, Mexico. Senator Salazar was duly elected by the citizens of the State of Coahuila, Mexico to serve as Senator in the Senate of the Republic. Senator Salazar seeks to recover the Defendant Funds for return to the treasury of the State of Coahuila, Mexico.

III. Senator Salazar's Interest in the Defendant Funds

4. Senator Salazar claims an interest in the Defendant Funds on behalf of the State of Coahuila, Mexico. Senator Salazar is a citizen of the State of Coahuila, Mexico and is a duly elected Senator representing the citizens of the State of Coahuila, Mexico in the Senate of the Republic. Senator Salazar seeks to recover the Defendant Funds for return to the treasury of the State of Coahuila, Mexico.

PRAYER FOR RELIEF

WHEREFORE, Senator Salazar requests entry of judgment in his favor as follows:

- a. Declaring that Defendant Funds are property of the State of Coahuila, Mexico;
- b. Awarding Defendant Funds to Senator Salazar for return to the treasury of the State of Coahuila, Mexico; and
- c. Awarding all further funds seized in this proceeding that rightfully belong to the State of Coahuila, Mexico to Senator Salazar for return to the treasury of the State of Coahuila, Mexico.
- d. Awarding such other further relief as the Court may deem just and proper.

Dated: March 13, 2013

Respectfully submitted,

SUSMAN GODFREY L.L.P.

By: /s/ Eric J. Mayer

Eric J. Mayer

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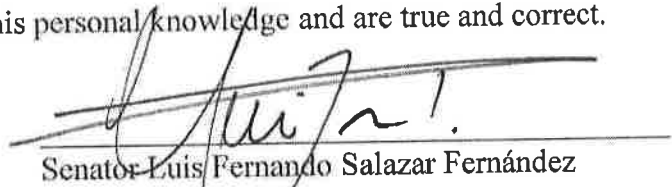
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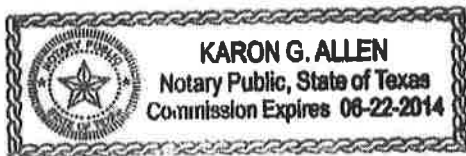
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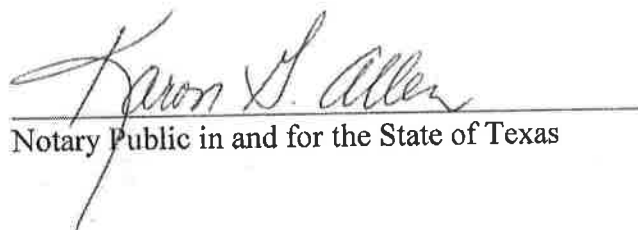
THE STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned Notary Public, on this day personally appeared Senator Luis Fernando Salazar Fernández, the affiant, known to me to be the person whose signature appears on this document. According to the affiant's statements after being duly sworn on his oath, Senator Luis Fernando Salazar Fernández has read the above and foregoing Claim of Senator Luis Fernando Salazar Fernández Contesting Asset Forfeiture, and states that the facts and statements contained therein are within his personal knowledge and are true and correct.


Senator Luis Fernando Salazar Fernández

SUBSCRIBED AND SWORN TO BEFORE ME this 11th day of March, 2013, to certify which witness my hand and seal of office.




Notary Public in and for the State of Texas

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March, 2013, a copy of the foregoing was served upon the following via electronic filing.

Julie K Hampton
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/s/ Eric J. Mayer
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